

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

SECURITY FIRST INNOVATIONS, LLC,

Plaintiff,

v.

Civil Action No. 2:23-cv-00097-JKW-RJK

GOOGLE LLC,

Defendant.

STIPULATED INTERIM PROTECTIVE ORDER

1. PURPOSES AND LIMITATIONS

Disclosure and discovery activity in this action are likely to involve production of confidential, proprietary, or private information for which special protection from public disclosure and from use for any purpose other than prosecuting this litigation may be warranted. The parties are negotiating a full-term protective order (“Protective Order”) that will address many confidentiality and other issues relating to discovery but would like to advance discovery and produce and exchange certain materials before that Protective Order is entered. Accordingly, the Parties hereby stipulate to and petition the Court to enter the following Stipulated Interim Protective Order. The Parties further acknowledge that this Stipulated Interim Protective Order does not entitle them to file confidential information under seal; Local Civil Rule 5 sets forth the procedures that must be followed and the standards that will be applied when a Party seeks permission from the Court to file material under seal.

2. USE AND LEVEL OF CONFIDENTIALITY

The parties stipulate and agree that:

1. All materials disclosed by either party or any third party as part of discovery in this case prior to the entry of the Protective Order shall be marked "HIGHLY CONFIDENTIAL-OUTSIDE ATTORNEYS' EYES ONLY" and disclosed only to the parties' outside counsel who has made an appearance on the record in this matter and their staff;

2. All materials disclosed by either party or any third party as part of discovery in this case prior to the entry of the Protective Order shall be used solely for the purpose of prosecuting or defending this litigation, and shall not be used for any other purposes or in any other proceedings; and

3. The entry of this Interim Protective Order shall not require the production of any specific materials and the parties reserve all rights and objections in the discovery process.

Entered: July __, 2023

United States District Judge